

EXHIBIT 15

FILED UNDER SEAL

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Civil Action No. 2:22-CV-203-JRG
)	
MICRON TECHNOLOGY, INC., MICRON)	JURY TRIAL DEMANDED
SEMICONDUCTOR PRODUCTS, INC.,)	
AND MICRON TECHNOLOGY TEXAS)	Filed Under Seal
LLC,)	
)	
Defendants.)	

**PLAINTIFF NETLIST, INC.’S FIRST NOTICE OF DEPOSITION OF DEFENDANTS
MICRON TECHNOLOGY, INC., MICRON SEMICONDUCTOR PRODUCTS, INC.,
AND MICRON TECHNOLOGY TEXAS LLC**

Please Take Notice that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, and the Local Rules of this Court, Plaintiff Netlist, Inc. (“Netlist”) directs the following interrogatories to defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC (collectively “Micron” or “Defendants”). The deposition(s) shall take place at a mutually agreeable place and date, beginning at 9:00 am and continuing from day-to-day thereafter (excluding Saturdays, Sundays, and holidays) until completed. The deposition(s) will be conducted pursuant to the Federal Rules of Civil Procedure and will be conducted in the English language before a notary public or other officer authorized to administer oaths. The deposition(s) may be recorded by stenographic means, audiotaped, videotaped, and/or transcribed using real time interactive transcription (e.g., LiveNote).

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Micron shall designate one or more of its officers, directors, managing agents, or other persons who are most knowledgeable, and competent to testify on its behalf, as to all matters known or reasonably available to Micron with

respect to the topics set forth in Attachment A. Pursuant to Federal Rule of Civil Procedure 30(b)(6), the person(s) designated should be prepared to testify as to such matters known or reasonably available to Micron. At least five (5) business days before the date set for the deposition(s), Micron shall identify, by name and position, each person so designated and shall set forth the matters on which that person will testify.

Netlist reserves the right to serve Micron with additional notices pursuant to Rule 30(b)(6) on additional topics as this litigation progresses and as further evidence is produced.

Dated: May 15, 2023

Respectfully submitted,

/s/ Jason G. Sheasby

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preservation, including both paper and electronic documents.

TOPIC NO. 82:

For each Micron Accused Product, the JEDEC specification(s) such Micron Accused Products practice.

TOPIC NO. 83:

The role played by any Micron employees in JEDEC meetings regarding the design and function of the PMIC present on DDR5 modules, the adoption of distributed data buffers in DDR4 LRDIMMs, or the adoption of the Advanced Memory Buffer (“AMB”) for DDR2 FBDIMMs, and the identification of the Micron employees who first defined these features on Micron DDR5 products, Micron FBDIMMs, or Micron LRDIMMs.

TOPIC NO. 84:

Any industry standards or practices relating to the licensing of or royalties for memory module technologies.

TOPIC NO. 85:

Any factual bases for Micron’s statement that it has an express or implied license to any Netlist’s patents-in-suit.

TOPIC NO. 86:

Any factual bases for Micron’s laches, inequitable conduct, and unclean hands defenses in connection with the ’506 patent.

TOPIC NO. 87:

Any factual bases for Micron’s position that Netlist failed to offer Micron a license on reasonable terms and conditions free of unfair discrimination and that Micron is a willing licensee to Netlist’s Patents-in-Suit.

TOPIC NO. 88:

Any factual bases for Micron's affirmative defenses.

TOPIC NO. 89:

For each Micron Accused Product, all facts and circumstances relating to Micron's position that the Accused Product does not practice one or more claims of Netlist's Patents-in-Suit.

CERTIFICATE OF SERVICE

I hereby certify that, on May 15, 2023, a true and correct copy of the foregoing instrument was served or delivered electronically via email to all counsel of record.

/s/Yanan Zhao
Yanan Zhao